

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
APR 28 2015
BY DAVID J. MALAND, CLERK
DEPUTY

UNITED STATES OF AMERICA

§
§
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§
§

v.

No. 4:13CR233
Judge Crone

ASHLEY WOODS (3)

FACTUAL STATEMENT

It is hereby stipulated and agreed by defendant **Ashley Woods (Woods)** that the following facts are true and correct and that she understands and agrees, with express consent of her counsel, David Haynes, that this Factual Statement may be used by the Court to determine whether her plea is voluntary and knowing and by the probation officer and the Court to determine an appropriate sentence for the offenses to which she is pleading guilty:

1. **Woods** is the same person charged in the Information.
2. Bank of America and JP Morgan Chase Bank were Financial Institutions insured by the Federal Deposit Insurance Corporation.
3. From in or about November 2010 through on or about December 31, 2011, **Woods** agreed with Terra Jackson and others to defraud Bank of America and JP Morgan Chase Bank in the Eastern District of Texas and elsewhere by cashing fraudulent checks, knowing there were insufficient funds in the maker accounts to cover the checks.
4. **Woods** knew that the conspiracy occurred in the Eastern District of Texas and elsewhere.
5. On or about December 6, 2011, **Woods** opened Bank of America checking account x3188 and JP Morgan Chase Bank account x4226 with \$25. **Woods** received a temporary debit

card and checks and in exchange for payment, gave the items and the PIN to Terra Jackson knowing they would be used to commit fraud.

6. On or about December 12, 2011, Terra Jackson entered JP Morgan Chase Bank, possessing several checks made payable to **Woods**. The checks were written from Woods's Bank of America bank account.

7. Terra Jackson cashed several checks, and **Woods** and Terra Jackson knew the checks were worthless but that Bank of America would cash them before verifying funds.

8. **Woods** knew that Terra Jackson was posing as other individuals and cashing worthless checks in the Eastern District of Texas and elsewhere. As an example, on or about November 12, 2010, Terra Jackson entered Bank of America in the Eastern District of Texas, posed as an individual known as KJ, and cashed checks made payable to KJ knowing the checks were worthless but that Bank of America would cash the checks before verifying funds

9. The loss to Bank of America foreseeable to **Woods** from her participation in the conspiracy was approximately \$716.00, and the loss to JP Morgan Chase Bank foreseeable to **Woods** was \$2,932.60.

DEFENDANT'S SIGNATURE AND ACKNOWLEDGMENT

I have read this Factual Statement and the Information or have had them read to me and have discussed them with my attorney. I fully understand the contents of this Factual Statement and agree without reservation that it accurately describes the events and my acts.

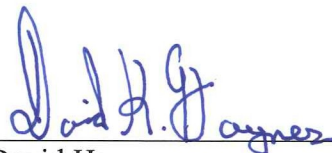
Dated: MARCH 23, 2015

x Ashley Woods
Ashley Woods
Defendant

DEFENSE COUNSEL'S SIGNATURE AND ACKNOWLEDGMENT

I have read this Factual Statement and the Information and have reviewed them with my client, Ashley Woods. Based upon my discussions with my client, I am satisfied that she understands the Factual Statement as well as the Information, and is knowingly and voluntarily agreeing to these stipulated facts.

Dated: MARCH 23, 2015



David Haynes
Attorney for Defendant